

Message

From: Biscoe, Melanie [Biscoe.Melanie@epa.gov]
Sent: 10/13/2022 10:29:38 PM
To: OPP PRD [OPP_PRD@epa.gov]
Subject: EPA Internal - Draft Baseline FIFRA Eco Mitigation Guidance
Attachments: 10-12-22 Draft Internal - Baseline FIFRA Eco Mitigation Guidance.docx

Importance: High

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PRD CRMs,

Attached is the along-awaited.... drum roll please... **(Draft) Baseline FIFRA Eco Mitigation Guidance!** We have talked about this a couple times in PRD's ESA All-Hands; now you get to see the details.

I have included comments in the draft Guidance indicating what mitigation or advisory language will be going forward, what won't, and anticipated changes to the mitigation and language.

Yes, are still some changes to be worked out! I'm hoping to get more certainty on these changes by next Wednesday 10/19, as well as timeline implications (particularly for the Q4 PIDs). However, we wanted you to still see the entirety of the guidance and mitigation/advisory measures, and be able to see where they may apply for your chemicals. Note that right now we only have the a.i.-level risk determinations from EFED for Q4 PID chemicals, and no explicit benefits determinations at the a.i. level from BEAD. We are working to see when we can get more details on both from EFED and BEAD, as that's pretty essential to using the Guidance! In the meantime, if you have team meetings already scheduled for your Q1 chemicals, teams can use their best judgement (for now) to estimate where the chemical falls as a whole and start integrating it into the risk, benefit and mitigation "story" of your chemical.

For **Q4 PID teams**, your timeline will shift a bit once again. For those with **Q1 PIDs**, I know you are already working with your teams to get PIDs out. Please familiarize yourself with the mitigation and advisory language. You can share with your teams, but please note my aforementioned caveats about upcoming changes! Please keep in mind that these measures are essentially minimum measures that are not intended to address all eco risk, and may be expanded upon if appropriate for your chemical based on the risks and benefits. They also may not obviate the need for chemical-specific measures like rate reductions or changes to application timing, etc.

Please do NOT share the draft Guidance outside EPA; this is internal guidance, and as such is internal, confidential, and deliberative. Note that various aspects of this mitigation will be shared in the November 17 ESA Webinar, just not the guidance document itself. (When the announcement goes out for that, Tracy or I will share it and encourage all of you to attend).

If you have questions after reviewing the draft Guidance, please send me a chat or call me on teams. We can also reserve some time at one of the ESA PRD-All Hands for some discussion and Q&A.

Thanks and Best Regards,

Melanie L. Biscoe

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